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Attorneys for Debtor
TIGER NATURAL GAS, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

**PG&E CORPORATION,
PACIFIC GAS AND ELECTRIC
COMPANY,**

Plaintiffs,

v.

**PUBLIC EMPLOYEES
RETIREMENT ASSOCIATION OF
NEW MEXICO, et al.**

Defendants.

Case No.: 19-30088(DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**OPPOSITION TO DEBTORS'
COMPLAINT FOR PRELIMINARY
AND PERMANENT INJUNCTIVE
RELIEF AS TO ACTIONS AGAINST
NON-DEBTORS**

Date: March 27, 2019

Time: 9:30 a.m.

Before: Hon. Dennis Montali
United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Ave.
San Francisco, CA 94102

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I. INTRODUCTION

Lumping it to together with over 20 other cases, Debtor PG&E asks the Court to enjoin the case styled *Tiger Natural Gas, Inc. v. Pacific Gas & Electric Co.*, No. 4:16-cv-06711 (JSW) (White, J.), currently pending in the Northern District of California (the “Tiger case”), largely on the basis that, absent an injunction, Debtor PG&E will “suffer an immediate, adverse and irreparable harm” if the case against the individual defendants proceeds. According to Debtor PG&E, the attention of its officers, directors, key employees and legal team will be diverted with litigating the Tiger case, thereby draining important resources away from the Chapter 11 proceeding. Further, according to PG&E, it will be necessarily be liable for the action of the individual defendants. Debtor PG&E’s suppositions, however, are neither accurate nor will necessarily lead to irreparable harm. The Court, accordingly, should deny the injunction as it applies to the Tiger case.

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The Parties and Factual Background

1. Tiger Natural Gas, Inc., is a Core Transport Agent (“CTA”) registered with the California Public Utilities Commission that provides retail natural gas to residences and small businesses within Debtor Pacific Gas & Electric Company’s (Debtor PG&E) territory in Northern California.

2. By right under Gas Rule 23, Tiger elected Consolidated PG&E Billing, under which Debtor PG&E places Tiger’s charges for its gas service on the customer’s monthly energy statement, collects from the customer, and then remits payment to Tiger. As such, Debtor PG&E acts as Tiger’s billing and collections agent. In connection with this role, Debtor PG&E sends Tiger daily and monthly electronic billing and payment reports purporting to inform Tiger about the status of its customer accounts.

3. On November 21, 2016, Tiger filed suit for acts of on-going fraud committed by Debtor PG&E and three of its employees. Specifically, Tiger alleges that Debtor PG&E seizes and then delays payment of money paid by Debtor PG&E’s and Tiger’s joint customer that should be remitted to Tiger. Tiger also alleges that Debtor PG&E presents certain credits, owed to the

1 customer by Debtor PG&E, on the joint customer's energy statement such that the customer
2 believes that no money is owed to Tiger (*i.e.*, the energy statement literally tells the customer that
3 nothing is owed and that no payment is due), again delaying or preventing payment to Tiger.
4 Finally, Tiger alleges that Debtor PG&E collects money owed to Tiger from disconnected joint
5 customers and does not pay that amount to Tiger.

6 4. Notably, the daily and monthly reports from Debtor PG&E to Tiger show only the
7 amount billed by Debtor PG&E and the amount that Debtor PG&E decided to allocate to Tiger,
8 giving Tiger the intended impression that the customer simply has paid Tiger while simultaneously
9 giving the joint customer the intended impression that she has paid in full. Debtor PG&E and the
10 individual defendants compound this fraud by refusing to provide Tiger with any other information
11 about Tiger's customer accounts.

12 5. Tiger's complaint identifies dozens of false and misleading statements contained in
13 the billing and payment reports constituting wire fraud, which have been on-going since at least
14 2011, as predicate acts under the Racketeer and Corrupt Organizations Act (RICO), 18 U.S.C. §§
15 1961-1968. Tiger named three employees of Debtor PG&E as RICO persons: Albert Torres,
16 William Chen, and Tanisha Robinson (now Tanisha Brown) as RICO Defendants. Tiger alleges that
17 Debtor PG&E is vicariously liable under a theory of respondeat superior.

18 6. Tiger's claims directly against Debtor PG&E include violation of the Sherman Act,
19 15 U.S.C. § 2, breach of fiduciary duty, intentional misrepresentation, negligent misrepresentation,
20 intentional interference with contract, intentional interference with prospective business advantage;
21 and violation of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§ 17200 *et seq.*

22 7. None of the individual defendants are officers or executives nor are they directly
23 involved in Debtor PG&E's bankruptcy. Mr. Torres retired from Debtor PG&E several years ago.
24 (Capritta Decl. ¶ 2, Depo. Albert Torres at 8:6-11, Exhibit 1.) At the time of his deposition in
25 August 2017, Mr. Chen was a principle regulatory analyst related to customer care regulatory
26 compliance and support for general rate cases and other proceedings. (Capritta Decl. ¶ 3, Depo.
27 William Chen at 7:25-8:9, Exhibit 2.) Ms. Brown supervises Debtor PG&E's gas billing team.
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1 (Capritta Decl. ¶ 4, Depo. Tanisha Brown at 11:12-15, Exhibit 3.) That is, none of the individual
2 defendants' responsibilities require their particular attention to Debtor PG&E's Chapter 11
3 reorganization.

4 8. Tiger's claims resemble those brought by another CTA, United Energy Trading,
5 against Debtor PG&E in a matter styled *United Energy Trading v. Pacific Gas & Electric*
6 *Company*, 3:15-cv-02383-RS (Seeborg, J.) (the "UET case"). In 2018, the UET case completed all
7 discovery, including expert discovery, and most pre-trial motions, including summary judgment and
8 motions under the *Daubert* standard, and trial was to start on March 11, 2019. (Capritta Decl. at ¶
9 5.)

10 9. Because of the similarities between the two cases, Debtor PG&E and Tiger have
11 worked together to ensure conservation of resources by both parties. For example, the parties
12 agreed to depose each PG&E witness once (unless the testimony was particular to either UET or
13 Tiger) and have agreed to certain discovery conventions. A single magistrate judge, Magistrate
14 Judge Sallie Kim, resolved discovery disputes in both cases. (Capritta Decl. at ¶ 6.)

15 10. The factual issues in both the Tiger case and the UET case center on Debtor PG&E's
16 billing and collections program, known as "CC&B," its programming, and changes to that
17 programming over the last decade. Magistrate Judge Kim, Judge White, and Judge Seeborg have
18 developed a high degree of knowledge into these factual issues and the positions of the parties
19 regarding the evidence in the case. (Capritta Decl. at ¶ 7.)

20 11. In addition, Judge White (and Judge Seeborg) are well-apprised of the legal issues at
21 work, which involve an interplay between PG&E's Gas Rules, Commission Rulings and California
22 and federal law.

23 12. On December 31, 2019, fact discovery largely closed in the Tiger case although the
24 Court ordered PG&E to provide an additional witness and a separate meeting of forensic examiners
25 on several issues surrounding the CC&B system (and the data provided by PG&E from that
26 system). Nevertheless, the parties completed fact discovery by the time Debtor PG&E filed for
27 Chapter 11 on January 31, 2019. (Capritta Decl. at ¶ 8.)
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1 13. On February 11, 2019, the individual defendants served their expert report in the
2 Tiger case. The report disclosed the exact same experts used by PG&E in the UET case, Daniel Ray
3 and Martin Quinn, employing the same strategy and methodology as they did in UET case. That is,
4 Mr. Ray reviewed the CC&B data for the accounts listed in the Tiger's complaint and opined that
5 no indicia of fraud exists, as his report concluded in the UET case. Dr. Quinn provided an historical
6 retrospective, just as he provided in his initial report in the UET case. That is, PG&E (and, by
7 extension, the individual defendants) follow the exact same expert strategy as set forth the UET
8 case. (Capritta Decl. at ¶ 9.)

9 14. On February 27, 2019, the Court stayed the Tiger case in its entirety, directing the
10 parties to provide a status report every 180 days and reserving the right to administratively close the
11 case based pending resolution of this bankruptcy proceeding. (Capritta Decl. ¶ 10, Order Staying
12 Case and Requiring Joint Status Reports, Exhibit 4.)

13 15. The only discovery remaining in the Tiger case involves serving Tiger's expert
14 reports, certain rebuttal reports, and expert depositions.

15 16. Tiger (together with UET) may move for relief from stay under 11 U.S.C. § 362(d)
16 depending on several factors in this proceeding.

17 17. Debtor PG&E will not suffer immediate, adverse, and irreparable harm despite its
18 assertions to the contrary.

19 18. First, the District Court has already stayed the Tiger case in its entirety and will not
20 advance the case further until at least August 26, 2019, long after this Court determines how Debtor
21 PG&E's Chapter 11 petition will proceed. Accordingly, Debtor PG&E's request to enjoin the Tiger
22 case not only does not rise to the standard of "immediate, adverse and irreparable harm," Debtor
23 PG&E's concerns about the Tiger case are, for all intents and purposes, moot.

24 19. Second, Debtor PG&E misplaces its apprehension that the focus of its officers,
25 directors, key personnel and legal team will be distracted by the Tiger case. None of the individual
26 defendants are officers, directors or key personnel—indeed, one of them retired several years ago.
27 Further, all the legal and factual issues—including several complicated discovery matters involving
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1 the CC&B system—were previously litigated in the UET case. As demonstrated by the recent
2 expert disclosures, Debtor PG&E’s and the individual defendants’ legal strategy will not deviate
3 from that employed by defendants the UET case to any remarkable degree. Accordingly, little
4 danger exists that Debtor PG&E’s legal team will be unduly distracted or consumed by the Tiger
5 case.

6 20. Further, the Tiger case is well advanced. The parties completed fact discovery in
7 January 2019 and only expert discovery remains. These matters require little to no expenditure of
8 employee resources since the factual record has closed. Further, as noted above, the experts will no
9 doubt follow the same strategy from the UET case, thus requiring little oversight from Debtor
10 PG&E’s in-house legal team.

11 21. Moreover, Debtor PG&E’s insistence that it will be liable for the acts of the
12 individual defendants constitutes an oversimplification. Tiger alleges that the individual defendants
13 acted as RICO persons and that Consolidated Billing itself is a RICO enterprise. Under Ninth
14 Circuit law, an employer may be liable for an employee’s racketeering activities if: (i) the employer
15 is distinct from the RICO enterprise; (ii) the employer benefitted from its employee’s RICO
16 violations; (iii) the employee’s conduct occurred substantially within the time and space limits
17 authorized by the employment; (iv) the employee was motivated, at least in part, by a purpose to
18 serve the employer; and (v) the act was of a kind that the employee was hired to perform. *Oki*
19 *Semiconductor Co. v. Wells Fargo Bank, N.A.*, 298 F.3d 768, 775-76 (9th Cir. 2002). However, if
20 the individual defendants acted outside the functions Debtor PG&E hired them to perform, then
21 respondeat superior liability will not apply. *Id.* at 778. Notably, Debtor PG&E has not wholly
22 ratified the acts of the individual defendants and, therefore, whether or not Debtor PG&E is the
23 “real party in interest” under the RICO claim has not been conclusively established.

24 22. Finally, Debtor PG&E’s requested injunction will work a hardship on Tiger since a
25 ruling in Debtor PG&E’s favor could have the effect of precluding or prejudging any subsequent
26 motion for relief from stay. As noted above, the Tiger case presents complicated legal and factual
27 issues over which the District Court has garnered significant expertise. While this Court may or
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1 may not find that expertise, along with other considerations, sufficient to outweigh the need to
2 maintain the stay, those issues ought to be determined in the proper context of a motion for relief
3 from stay.

4 23. In sum, the Tiger case poses little danger of hardship to Debtor PG&E. The District
5 Court stayed the entire case on February 28, 2019 and no additional action will be necessary until
6 August 2019. Even so, discovery is largely complete, with only expert discovery remaining.
7 Further, Debtor PG&E and the individual defendants will likely employ the same strategy used in
8 the UET case, requiring little additional attention from Debtor PG&E's legal team. Finally, the
9 Tiger case presents complex legal and factual issues which may warrant relief from stay and,
10 therefore, should not be predetermined in the context of this adversary proceeding.

11 **COUNT ONE**

12 (Section 105 Preliminary and Permanent Injunction)

13 24. Tiger repeats and realleges the allegations contained in the preceding paragraphs.

14 25. Tiger admits that Debtors seek a preliminary and permanent injunction to stay the
15 continued prosecution of the Related Actions against the Non-Debtor Defendants under section
16 105(a) of the Bankruptcy Code until the Debtors emerge from Chapter 11, as set forth in Paragraph
17 47 of the Complaint.

18 26. Tiger admits that this Court has the jurisdiction and authority to enjoin the Tiger case
19 under section 105(a) because the Tiger case is related to the Chapter 11 Cases as set forth in
20 Paragraph 48 of the Complaint; Tiger denies that the Tiger case would unduly interfere with the
21 Chapter 11 Cases.

22 27. Tiger admits that a Bankruptcy Court may "issue any order, process, or judgment
23 that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code] (11 U.S.C. §
24 105(a)), " as set forth in Paragraph 49 of the Complaint.

25 28. Tiger admits that the Bankruptcy Court may issue injunctive relief provided that the
26 elements for that relief have been met. *See Solidus Networks, Inc. v. Excel Innovations, Inc. (In re*
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28

1 *Excel Innovations*), 502 F.3d 1086, 1095-96 (9th Cir. 2007). Tiger denies the remainder of
2 Paragraph 50 of the Complaint.

3 29. Tiger lacks sufficient evidence to admit or deny the allegations of Paragraph 51 and
4 therefore denies them.

5 30. Tiger denies that Debtor PG&E will suffer immediate, adverse and irreparable harm
6 absent the injunction, as set forth in Paragraph 52.

7 31. Tiger denies that the balance of hardships favors an injunction, as set forth in
8 Paragraph 53. Indeed, the balance of hardships favors denial of the injunction, for all the reasons set
9 forth above.

10 32. Tiger denies the allegations in Paragraph 54.

11 33. Tiger denies that the injunction is necessary and proper.

12 Pursuant to the Federal Rules of Bankruptcy Procedure 7012(b), Tiger consents to entry of
13 final orders or judgment by the Court.

14 Tiger therefore asks the Court to deny Debtor PG&E's request for a preliminary and
15 permanent injunction under section 105 of the Bankruptcy Code with regard to the Tiger case.

16
17 Dated: March 13, 2019.

HOLLAND & KNIGHT LLP

18 By: /s/Vince Farhat
19 Vince Farhat

20 *Attorney for Creditor,*
21 *Tiger Natural Gas, Inc.*

EXHIBIT 1

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1	UNITED STATES DISTRICT COURT	1	INDEX OF EXAMINATION
2	NORTHERN DISTRICT OF CALIFORNIA	2	
3	SAN FRANCISCO DIVISION	3	WITNESS: ALBERT TORRES
4		4	EXAMINATION PAGE
5	UNITED ENERGY TRADING, LLC,	5	By Ms. Capritta 7
6	Plaintiff,	6	
7		7	
8	Case No.	8	--oOo--
9	3:15-CV-2383-RS	9	
10	v.	10	
11	PACIFIC GAS AND ELECTRIC COMPANY,	11	
12	a California corporation; ALBERT	12	
13	TORRES, an individual; BILL CHEN,	13	
14	an individual; TANISHA ROBINSON,	14	
15	an individual,	15	
16	Defendants.	16	
17		17	
18		18	
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20		20	
21		21	
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24		24	
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13	HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY		
14	VIDEOTAPED DEPOSITION OF		
15	ALBERT TORRES		
16	August 30, 2017		
17	8:59 A.M.		
18			
19	50 California Street, Suite 2800		
20	San Francisco, California		
21			
22			
23			
24	REPORTED BY: INGRID SKOROBHATY, CSR NO. 11669		
25	Job No. J0625021		
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3	For the Plaintiff:	3	Exhibit 375 - One page headed "Customer
4	HOLLAND & KNIGHT	4	Services Communication" 68
5	BY: LEAH CAPRITTA, ATTORNEY AT LAW	5	Exhibit 376 - Multipage document headed
6	1801 California Street, Suite 5000	6	"Master CTA" 74
7	Denver, CO 80202	7	Exhibit 377 - Multipage document headed
8	303.974.6646	8	"CTA Billing" 77
9	leah.capritta@hklaw.com	9	Exhibit 378 - Multipage document headed
10		10	"Questions about Payment
11		11	Allocations and
12		12	Cancellations" 97
13		13	Exhibit 379 - Multipage document headed
14		14	"Reallocation of Funds" 101
15	For the Defendants:	15	Exhibit 380 - Printout of e-mail
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17	BY: LAURIE EDELSTEIN, ATTORNEY AT LAW	17	attachments 124
18	1891 Page Mill Road, Suite 200	18	Exhibit 381 - Printout of e-mail
19	Palo Alto, CA 94304	19	correspondence 125
20	650.687.9570	20	Exhibit 382 - Printout of e-mail
21	ledelstein@steptoe.com	21	correspondence with
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Page 6	Page 8
<p>1 SAN FRANCISCO, CALIFORNIA</p> <p>2 WEDNESDAY, AUGUST 30, 2017, 8:59 A.M.</p> <p>3</p> <p>4 THE VIDEOGRAPHER: Good morning. This</p> <p>5 begins number -- Video No. 1, Volume I, in the</p> <p>6 deposition of Al Torres in the matter of United</p> <p>7 Energy Trading versus Pacific Gas & Electric,</p> <p>8 et al., in the United States District Court,</p> <p>9 Northern District of California, San Francisco</p> <p>10 Division, the case number of which is 3:15-CV-02383.</p> <p>11 Today's date is August 30th, 2017, and the</p> <p>12 time on the video monitor is 9:00 o'clock a.m.</p> <p>13 The deposition is being taken at 50</p> <p>14 California Street, San Francisco, California, and</p> <p>15 was made at the request of the defendant [sic].</p> <p>16 The court reporter producing the official</p> <p>17 transcript for today's testimony is Ingrid</p> <p>18 Skorobohaty of Esquire Deposition Solutions.</p> <p>19 The videographer is Marisa Ramos of</p> <p>20 Esquire Deposition Solutions.</p> <p>21 Will counsel please identify yourselves</p> <p>22 and state whom you represent.</p> <p>23 MS. CAPRITTA: You know, can -- my name is</p> <p>24 Leah Capritta on behalf of Holland & Knight, and if</p> <p>25 I could just correct what the videographer said a</p>	<p>1 record?</p> <p>2 A. Albert Torres.</p> <p>3 Q. Where do you live, Mr. Torres?</p> <p>4 A. 8253 Trevi Way, El Dorado Hills,</p> <p>5 California.</p> <p>6 Q. Where do you work, Mr. Torres?</p> <p>7 A. I am retired.</p> <p>8 Q. When did you retire?</p> <p>9 A. February 1st of this year.</p> <p>10 Q. Where did you work before you retired?</p> <p>11 A. Pacific Gas & Electric Company.</p> <p>12 Q. What was your last position at Pacific Gas</p> <p>13 & Electric?</p> <p>14 A. Vice president, customer operations.</p> <p>15 Q. I'm sure that your attorney has already</p> <p>16 gone over sort of some of the guidelines for having</p> <p>17 your deposition taken with you, but I will do so</p> <p>18 here as well.</p> <p>19 Sort of the first guideline is that we</p> <p>20 answer one at a time, so I'm going to ask that you</p> <p>21 wait until I finish. Oh, I see you smiling. I</p> <p>22 think maybe Ms. Edelstein has said something about</p> <p>23 this. If you would wait until I finish my question</p> <p>24 and give yourself a little pause to think about my</p> <p>25 question and then answer it, I would appreciate</p>

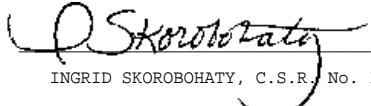


<p style="text-align: right;">Page 9</p> <p>1 that. This not only has the purpose of giving me 2 your best testimony, but it also ensures that we 3 don't speak over each other, which is a benefit to 4 the court reporter, who is taking down everything we 5 say. 6 You'll notice that there is a videographer 7 and a court reporter, and although they both serve 8 their individual functions, the official record is 9 actually what the court reporter is taking down 10 right now. 11 So will you remember to give me a little 12 pause after my question, please? 13 A. Sure. 14 Q. Thank you. 15 The second guideline is that I'm going to 16 ask you to provide me with oral answers today. If 17 you nod your head or shake your head or shrug your 18 shoulders, I'll know what you're talking about, 19 it'll be captured on the video, but again, the court 20 reporter will have difficulty taking that down, 21 okay? 22 A. Okay. 23 Q. And finally, if you need a break at any 24 point, go ahead and ask me for a break, and we'll 25 take it. I will ask, however, that, if I have posed</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. So what did you do before 2008? 2 A. I held a variety of positions, ranging 3 from field engineer to supervisor, leading 4 everything from regulatory to customer service to 5 engineering to marketing, product development, 6 ultimately ending up as -- in the 7 customer-operations function. 8 Q. Well, what was your job immediately before 9 becoming vice president of customer operations? 10 A. I was senior director of customer 11 operations. At that time, I believe it was called 12 credit and records. 13 Q. Was there a reorganization in 2008, or did 14 the name just change? 15 A. In 2008, the name just changed, and I 16 became an officer because of my expanded duties. 17 Q. How did your duties expand? 18 A. There were some departures at PG&E. I was 19 assigned to take over responsibility, in addition to 20 my other duties, the deployment of SmartMeters, and 21 that added to my workload and my scope, and I became 22 vice president at that point. 23 Q. What groups or divisions reported to you 24 as vice president of customer operations? 25 A. It was the full process starting with the</p>
<p style="text-align: right;">Page 10</p> <p>1 a question to you, that you answer it before we take 2 our break, okay? 3 A. Okay. 4 MS. CAPRITTA: All right. 5 MS. EDELSTEIN: And the only exception to 6 that is if there is a question that you think might 7 reveal attorney-client information, then you would 8 have an opportunity to consult with me before 9 answering. 10 BY MS. CAPRITTA: 11 Q. So you stated that you were the vice 12 president of customer operations. For how long were 13 you the vice president of customer operations? 14 A. About nine years. 15 Q. So you began in that position in 2008? 16 A. Yes. 17 Q. What -- were you at Pacific Gas & Electric 18 before 2008? 19 A. I was. 20 Q. For how long in total did you work for -- 21 and if I call them "PG&E," will you know -- 22 A. Yes. 23 Q. Okay. 24 For how long did you work for PG&E? 25 A. 38 years.</p>	<p style="text-align: right;">Page 12</p> <p>1 specification, purchase, installation of meters, the 2 maintenance on meters, the reading of the meters; 3 the delivery of that information to the billing 4 system; and then the management of customer records 5 and billing records within the system; the 6 production of bills; the processing of payments by 7 customers, ranging from paper payments, electronic 8 payments, to the processing of payments into our 9 accounting system and ultimately our credit and 10 collections organization to pursue delinquent 11 account collections as well. 12 Q. So you testified about the delivery of the 13 information from the meters to the billing system. 14 How is that accomplished? 15 A. It's accomplished in various ways. 16 Traditionally, a meter reader would read a 17 meter and take the reading into an electronic 18 handheld device. That device is downloaded -- 19 uploaded daily to our IT system, and then the IT 20 system then does the math and calculates the bill. 21 With the advent of SmartMeter, the 22 meter-reader function is eliminated and replaced 23 with a electronic -- an electronic communication 24 from the meter to a network infrastructure, and then 25 that network infrastructure is tied into our billing</p>

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1 Q. And I'm not really talking about
2 reconciliation. And it's more of a -- it's almost
3 like a physical thing, you know, where the money is
4 affirmatively handed over to the CTAs. Is that
5 something that your organization handled?
6 A. No. No.
7 Q. Whose organization was responsible for
8 that?
9 A. I'm not sure. If I had to think about it,
10 maybe accounts payable. I'm not sure.
11 MS. CAPRITTA: Okay. I do not think I
12 have any more questions for Mr. Torres today.
13 MS. EDELSTEIN: If we can mark the
14 deposition highly confidential. I believe that
15 there was documents marked highly confidential,
16 attorneys' eyes only shown to Mr. Torres. As well
17 as I'd like to request, on behalf of Mr. Torres, an
18 opportunity to review the transcript when it's
19 available and make any corrections necessary.
20 THE VIDEOGRAPHER: This concludes today's
21 proceedings in the deposition of Al Torres. The
22 number of disks used is four. We are now going off
23 the record. The time is 3:41.
24 (Proceedings concluded at 3:41 p.m.)
25

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1 REPORTER'S CERTIFICATION
2
3 I, INGRID SKOROBOHATY, a Certified
4 Shorthand Reporter, hereby certify that the witness
5 in the foregoing deposition was by me duly sworn to
6 tell the truth, the whole truth and nothing but the
7 truth in the within-entitled cause;
8 That said deposition was taken down in
9 shorthand by me, a disinterested person, at the time
10 and place therein stated, and that the testimony of
11 the said witness was thereafter reduced to
12 typewriting, by computer, under my direction and
13 supervision, and that the witness has requested a
14 review pursuant to Rule 30(e)(2).
15 I further certify that I am not of counsel
16 or attorney for either or any of the parties to the
17 said deposition, nor in any way interested in the
18 event of this cause, and that I am not related to
19 any of the parties thereto.
20
21 DATED: September 6, 2017
22
23 
24 INGRID SKOROBOHATY, C.S.R. No. 11669
25

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1 DEPOSITION ERRATA SHEET
2 Assignment No.: J0625021
3 Case Caption: United Energy Trading, LLC v. Pacific
4 Gas and Electric Company, et al.
5
6 DECLARATION UNDER PENALTY OF PERJURY
7 I declare under penalty of perjury that I
8 have read the entire transcript of my deposition
9 taken in the captioned matter or the same has been
10 read to me, and the same is true and accurate, save
11 and except for changes and/or corrections, if any,
12 as indicated by me on the DEPOSITION ERRATA SHEET
13 hereof, with the understanding that I offer these
14 changes as if still under oath.
15 Signed on the ____ day of _____,
16 20____.
17
18 _____
19 ALBERT TORRES
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1 DEPOSITION ERRATA SHEET
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20 Page No. __ Line No. __ Change to: _____
21 _____
22 Reason for change: _____
23 _____
24 SIGNATURE: _____ DATE: _____
25 ALBERT TORRES



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EXHIBIT 2

<div>1UNITED STATES DISTRICT COURT</div> <div>2NORTHERN DISTRICT OF CALIFORNIA</div> <div>3SAN FRANCISCO DIVISION</div> <div>4</div> <div>5UNITED ENERGY TRADING, LLC,</div> <div>6</div> <div>7Plaintiff,</div> <div>8</div> <div>9Case No.</div> <div>103:15-CV-2383-RS</div> <div>11v.</div> <div>12PACIFIC GAS AND ELECTRIC COMPANY,</div> <div>13a California corporation; ALBERT</div> <div>14TORRES, an individual; BILL CHEN,</div> <div>15an individual; TANISHA ROBINSON,</div> <div>16an individual,</div> <div>17Defendants.</div> <div>18</div> <div>19HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY</div> <div>20VIDEOTAPED DEPOSITION OF</div> <div>21WILLIAM H. CHEN</div> <div>22August 22, 2017</div> <div>238:57 A.M.</div> <div>24</div> <div>2550 California Street, Suite 2800</div> <div>San Francisco, California</div> <div>26</div> <div>27REPORTED BY: INGRID SKOROBOHATY, CSR NO. 11669</div> <div>28Job No. J0625020</div>	<div>1INDEX OF EXAMINATION</div> <div>2</div> <div>3WITNESS: WILLIAM H. CHEN</div> <div>4EXAMINATIONPAGE</div> <div>5By Ms. Capritta7</div> <div>6</div> <div>7</div> <div>8--oOo--</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>1APPEARANCES:</div> <div>2</div> <div>3For the Plaintiff:</div> <div>4HOLLAND & KNIGHT</div> <div>5BY: LEAH CAPRITTA, ATTORNEY AT LAW</div> <div>61801 California Street, Suite 5000</div> <div>7Denver, CO 80202</div> <div>8303.974.6646</div> <div>9leah.capritta@hklaw.com</div> <div>10</div> <div>11For the Defendants:</div> <div>12</div> <div>13STEPTOE & JOHNSON LLP</div> <div>14BY: LAURIE EDELSTEIN, ATTORNEY AT LAW</div> <div>151891 Page Mill Road, Suite 200</div> <div>16Palo Alto, CA 94304</div> <div>17650.687.9570</div> <div>18ledelstein@steptoe.com</div> <div>19</div> <div>20Also Present:</div> <div>21MARISA RAMOS, Videographer</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1INDEX OF EXHIBITSPAGE</div> <div>2</div> <div>3Exhibit 286 - Printout of e-mail68</div> <div>4correspondence with</div> <div>5attachments</div> <div>6Exhibit 287 - Printout of e-mail72</div> <div>7correspondence with</div> <div>8attachments</div> <div>9Exhibit 288 - Printout of e-mail78</div> <div>10correspondence with</div> <div>11attachments</div> <div>12Exhibit 289 - Printout of e-mail82</div> <div>13correspondence with</div> <div>14attachments</div> <div>15Exhibit 290 - Printout of e-mail90</div> <div>16correspondence with</div> <div>17attachments</div> <div>18Exhibit 291 - Printout of e-mail96</div> <div>19correspondence with</div> <div>20attachments</div> <div>21Exhibit 292 - Printout of e-mail101</div> <div>22correspondence</div> <div>23Exhibit 293 - Printout of e-mail123</div> <div>24correspondence with</div> <div>25attachments</div> <div>26Exhibit 294 - Printout of e-mail129</div> <div>27correspondence</div> <div>28Exhibit 295 - Printout of e-mail132</div> <div>29correspondence</div> <div>30Exhibit 296 - Printout of e-mail144</div> <div>31correspondence</div> <div>32Exhibit 297 - Printout of e-mail147</div> <div>33correspondence</div> <div>34Exhibit 298 - Printout of e-mail147</div> <div>35correspondence with</div> <div>36attachments</div>



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Page 5			Page 7		
1	INDEX OF EXHIBITS (Continued)	PAGE	1	Step toe & Johnson, on behalf of the Defendants	
2			2	Pacific Gas & Electric Company, Albert Torres,	
3	Exhibit 299 - Printout of e-mail correspondence with attachments	154	3	William Chen, and Tanisha Robinson.	
4			4	THE VIDEOGRAPHER: Thank you.	
5	Exhibit 300 - Printout of e-mail correspondence	154	5	Will the court reporter please swear in	
6	Exhibit 301 - Printout of e-mail correspondence	160	6	the witness.	
7			7		
8	Exhibit 302 - Printout of e-mail correspondence	188	8	WILLIAM H. CHEN,	
9	Exhibit 303 - Multipage document, first page labeled "Core Transport Agent (CTA) Escalated Complaints Increase"	199	9	having been first duly sworn, testified as follows:	
10			10		
11			11	EXAMINATION	
12	Exhibit 304 - Printout of e-mail correspondence	211	12	MS. CAPRITTA: Good morning, Mr. Chen.	
13	Exhibit 305 - Printout of e-mail correspondence	223	13	THE WITNESS: Good morning.	
14			14	BY MS. CAPRITTA:	
15	Exhibit 306 - Printout of e-mail correspondence	225	15	Q. Could you please state your name formally	
16	Exhibit 307 - Printout of e-mail correspondence	228	16	for the record?	
17			17	A. William H. Chen.	
18	Exhibit 308 - Printout of e-mail correspondence	232	18	Q. And Mr. Chen, where do you live?	
19	Exhibit 309 - Printout of e-mail correspondence	235	19	A. I live in San Ramon, California.	
20			20	Q. Have you ever had your deposition taken	
21	Exhibit 310 - Printout of e-mail correspondence	246	21	before?	
22			22	A. No.	
23			23	Q. For whom do you work, Mr. Chen?	
24			24	A. Pacific Gas & Electric Company.	
25			25	Q. And what is your current title?	

Page 6			Page 8		
1	SAN FRANCISCO, CALIFORNIA		1	A. Current title is principal regulatory	
2	TUESDAY, AUGUST 22, 2017, 8:57 A.M.		2	analyst.	
3			3	Q. What do you do as a principal regulatory	
4	THE VIDEOGRAPHER: Good morning. This		4	analyst?	
5	begins Video No. 1, Volume I, in the deposition of		5	A. I work within the customer care regulatory	
6	Bill Chen in the matter of United Energy Trading		6	compliance and policy department, and I provide	
7	versus Pacific Gas & Electric, et al., in the United		7	support for our general rate cases and also other	
8	States District Court, Northern District of		8	proceedings that pertain to our customer care	
9	California, San Francisco Division, the case number		9	organization before the Public Utilities Commission.	
10	of which is 3:15-CV-02383-RS.		10	Q. What is customer care?	
11	Today's date is August 22nd, 2017, and the		11	A. Customer care is a department within PG&E.	
12	time on the monitor is 8:57.		12	Q. Okay.	
13	The deposition is being taken at 50		13	Well, what does it do? What does the	
14	California Street, San Francisco, California, and		14	customer care department do?	
15	was made at the request of the plaintiff.		15	A. Customer care is a very large	
16	The court reporter producing the official		16	organization. There are many different -- I guess	
17	transcript for today's testimony is Ingrid		17	you call them maybe sub lines of businesses.	
18	Skorobohaty of Esquire Deposition Solutions, and		18	Q. Such as what? What sub lines of	
19	Marisa Ramos of Esquire Deposition Solutions.		19	businesses are there?	
20	Will counsel please identify yourselves		20	A. So there are -- there's customer service,	
21	and state whom you represent.		21	there's customer operations, and there is the	
22	MS. CAPRITTA: This is Leah Capritta of		22	customer energy solutions sub line of business.	
23	Holland & Knight on behalf of the plaintiff, United		23	Q. So I'm going to back up a little bit and	
24	Energy Trading, LLC.		24	give you a couple guidelines for your deposition	
25	MS. EDELSTEIN: Laurie Edelstein, from		25	here today.	



Page 9

1 The first is that I'm going to ask that we
2 only speak one at a time during the deposition. You
3 will have an impulse, I think, to anticipate what my
4 question is by the beginning of the question and
5 then want to answer it before I finish asking the
6 question, but if you would please just wait until I
7 finish answering [sic] the question, give yourself a
8 moment to think about your answer, and then provide
9 me with that answer. And the reason for that is
10 really kind of a practical one. The court reporter
11 is here taking down everything we say, and if we
12 talk over each other, it's going to be difficult for
13 her to take -- to take that down.
14 So can you do that for me?
15 A. I -- yes. I understand.
16 Q. Okay.
17 The second thing is that I'm going to ask
18 that you provide me with oral answers today, so, you
19 know, if you nod your head or shake your head or
20 shrug your shoulders, I might know what you're
21 saying because I'm right here -- and of course the
22 video is taking it down -- but again, that's
23 something that's difficult for the reporter to take
24 down, and she really is providing the official
25 record here.

Page 10

1 Okay?
2 A. Yes.
3 Q. All right.
4 And finally, if it -- if you need a break
5 at any time, go ahead and ask me to do that. And
6 you'll find that we do take breaks fairly regularly,
7 about once an hour, depending on how the questions
8 are going, but if for some reason you do need to
9 take a break in the middle or before we take our
10 next break, you can ask me to do that, and we'll
11 take one. The only thing that I'll ask is that you
12 answer any question that I have posed, and then we
13 can take our break.
14 Okay?
15 A. That sounds good.
16 Q. All righty.
17 So we were talking about the different --
18 I think you called them sub lines of businesses
19 within the customer care organization, and one of
20 which is customer service. Describe for me what
21 customer service is responsible for.
22 A. The customer service organization is
23 responsible for basically being the company's, you
24 know, primary, you know, relationship -- you know,
25 managing our relationships with our customers.

Page 11

1 We have -- we have an organization that,
2 you know, primarily fields calls and service
3 inquiries from our residential customers and also
4 for our business customers that's done through our
5 customer contact centers or through our local
6 customer service offices, and then we also have a
7 department that manages relationships with our
8 commercial, industrial, and agricultural customers.
9 Q. Okay.
10 So you said that you have an organization
11 that fields calls and service inquiries from
12 residential customers and for business customers,
13 and so are -- are those generally referred to as
14 core customers?
15 MS. EDELSTEIN: Objection to form.
16 BY MS. CAPRITTA:
17 Q. You'll find, from time to time, that your
18 counsel may interpose objections, and that's her
19 job, but unless she instructs you not to answer, if
20 you could go ahead and answer the question, please.
21 A. We don't typically refer to them as core
22 customers in -- in that context.
23 Q. Okay.
24 Well, do you understand what the term
25 "core customer" means?

Page 12

1 A. Core customers, yes. Yes, I do.
2 Q. Okay.
3 And what is that?
4 A. "Core customers" is typically a term that
5 we use in the -- on the gas side of the business for
6 residential customers. It can be small business
7 customers as well.
8 Q. What distinguishes a core customer that
9 would be a business from a -- a different commercial
10 customer?
11 A. Usage.
12 Q. Do you know what the usage cutoff is --
13 A. I --
14 Q. -- for that?
15 A. I don't recall.
16 Q. Gotta wait till I finish.
17 Go ahead, though.
18 A. I -- I don't recall the threshold.
19 Q. So we were talking about the customer
20 service, which you stated was a -- an area of
21 responsibility was the relationship with customers
22 and you do that through customer contact centers.
23 What is a customer contact center?
24 A. A customer contact center is -- you know,
25 primarily we have phone-based employees who take



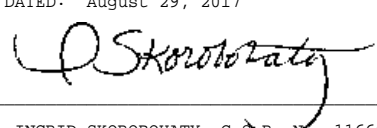
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1 (Proceedings concluded at 5:39 p.m.)
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1 DEPOSITION ERRATA SHEET
2 Assignment No.: J0625020
3 Case Caption: United Energy Trading, LLC v. Pacific
Gas and Electric Company, et al.
4
5
6 DECLARATION UNDER PENALTY OF PERJURY
7 I declare under penalty of perjury that I
8 have read the entire transcript of my deposition
9 taken in the captioned matter or the same has been
10 read to me, and the same is true and accurate, save
11 and except for changes and/or corrections, if any,
12 as indicated by me on the DEPOSITION ERRATA SHEET
13 hereof, with the understanding that I offer these
14 changes as if still under oath.
15 Signed on the ____ day of _____,
16 20____.
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19 WILLIAM H. CHEN
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Page 250

1 REPORTER'S CERTIFICATION
2
3 I, INGRID SKOROBHATY, a Certified
4 Shorthand Reporter, hereby certify that the witness
5 in the foregoing deposition was by me duly sworn to
6 tell the truth, the whole truth and nothing but the
7 truth in the within-entitled cause;
8 That said deposition was taken down in
9 shorthand by me, a disinterested person, at the time
10 and place therein stated, and that the testimony of
11 the said witness was thereafter reduced to
12 typewriting, by computer, under my direction and
13 supervision, and that the witness has not requested
14 a review pursuant to Rule 30(e)(2).
15 I further certify that I am not of counsel
16 or attorney for either or any of the parties to the
17 said deposition, nor in any way interested in the
18 event of this cause, and that I am not related to
19 any of the parties thereto.
20
21 DATED: August 29, 2017
22
23 
24 INGRID SKOROBHATY, C.S.R. No. 11669
25

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1 DEPOSITION ERRATA SHEET
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22 Reason for change: _____
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24 SIGNATURE: _____ DATE: _____
25 WILLIAM H. CHEN



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EXHIBIT 3

Page 1

1 UNITED STATES DISTRICT COURT
 2 NORTHERN DISTRICT OF CALIFORNIA
 3 SAN FRANCISCO DIVISION
 4
 5 UNITED ENERGY TRADING, LLC,
 6
 7 Plaintiff,
 8
 9 Case No.
 10 3:15-CV-2383-RS
 11
 12 v.
 13 PACIFIC GAS AND ELECTRIC COMPANY,
 14 a California corporation; ALBERT
 15 TORRES, an individual; BILL CHEN,
 16 an individual; TANISHA ROBINSON,
 17 an individual,
 18 Defendants.
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1 APPEARANCES:
 2
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 16 650.687.9570
 17 ledelstein@steptoe.com
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 20 CUTLER ANDRUS, Videographer
 21
 22
 23
 24
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1 SAN FRANCISCO, CALIFORNIA

2 WEDNESDAY, AUGUST 16, 2017, 9:03 A.M.

3

4 THE VIDEOGRAPHER: This begins Video No. 1

5 in the deposition of Tanisha Robinson-Brown in the

6 matter of United Energy Trading versus Pacific Gas &

7 Electric Company in the United States District Court

8 for the Northern District of California, the case

9 number of which is 3:15-CV-2383.

10 Today's date is August 16th, 2017, and the

11 time on the video monitor is 9:03 a.m.

12 We are located at 50 California Street in

13 San Francisco, California.

14 The court reporter producing the official

15 transcript of today's testimony is Ingrid

16 Skorobohaty of Esquire Deposition Solutions.

17 The videographer is Cutler Andrus of

18 Esquire Deposition Solutions.

19 Will counsel please identify yourselves

20 and state whom you represent.

21 MS. CAPRITTA: This is Leah Capritta of

22 Holland & Knight, representing the plaintiff, United

23 Energy Trading, LLC.

24 MS. EDELSTEIN: Laurie Edelstein from

25 Steptoe & Johnson representing the Defendant Pacific

Page 8

1 Gas & Electric Company and the individual Defendants

2 Albert Torres, William Chen, and Tanisha Robinson.

3 THE VIDEOGRAPHER: Will the court reporter

4 please swear in the witness.

5

6 TANISHA ROBINSON-BROWN,

7 having been first duly sworn, testified as follows:

8

9 EXAMINATION

10 MS. CAPRITTA: Good morning, Ms. Robinson.

11 THE WITNESS: Good morning.

12 BY MS. CAPRITTA:

13 Q. I think you just heard that my name is

14 Leah Capritta, and I represent the plaintiff in this

15 matter and I think you and I met --

16 A. Yes.

17 Q. -- maybe about a year or so --

18 A. Mm-hmm.

19 Q. -- ago.

20 So thank you for coming to appear today.

21 Would you please formally state your name

22 for the record?

23 A. Tanisha Robinson-Brown.

24 Q. And do you prefer "Ms. Brown" or

25 "Ms. Robinson-Brown"?



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EsquireSolutions.com

<p style="text-align: right;">Page 9</p> <p>1 A. "Ms. Brown" is fine. 2 Q. Okay. 3 And where do you live, Ms. Brown? 4 A. I live in Suisun City, California. 5 Would you like the spelling? 6 Q. Like Sin City, California? 7 A. No. Suisun. 8 Q. Suisun. Okay. 9 A. It's S-U-I-S-U-N City. 10 Q. Okay. 11 And where do you work? 12 A. I work for Pacific Gas & Electric Company. 13 Q. And if I refer to Pacific Gas & Electric 14 Company as "PG&E," will you know what I'm -- 15 A. Yes. 16 Q. -- who I'm talking about? 17 So I usually start off depositions just by 18 giving the deponent some guidelines. 19 A. Okay. 20 Q. The first guideline is that -- well, first 21 of all, we should please have care that we don't 22 talk over each other. If you would just wait until 23 I finish my question, maybe even give yourself a 24 couple of seconds to think about the question, 25 before giving an answer, that'll not only give the</p>	<p style="text-align: right;">Page 11</p> <p>1 about once an hour. If you do want a break that's 2 not, you know, one of our scheduled breaks, you -- 3 please just ask me, and we can go ahead and take a 4 break. I will ask, though, that you answer any 5 question that I have posed before we take our break, 6 okay? 7 A. Okay. 8 Q. And so you testified just now that you 9 work for Pacific Gas & Electric. For how long have 10 you worked for PG&E? 11 A. 22 years. 12 Q. And what is your current position? 13 A. I currently supervise the gas billing 14 solutions team, which also includes EDI support team 15 and ESP support team. 16 Q. Approximately how many people work under 17 you? 18 A. Ten. 19 Q. How long have you held this position? 20 A. I've been supervising this team for six 21 years. 22 Q. So since about 2011? 23 A. Yes. 24 Q. What did you do before you were the 25 supervisor for the gas billing solutions team?</p>
<p style="text-align: right;">Page 10</p> <p>1 court reporter a chance to take down everything 2 that's said, but it'll also give your counsel a 3 chance to object just in case she needs to. 4 If she does object, please go ahead and 5 answer my question unless she gives you an 6 opportunity -- unless she instructs you not to do 7 so. She makes objections -- and that's part of her 8 job -- in order to preserve an objection for trial. 9 Okay? 10 A. (Nods head.) 11 Q. The second thing that I'm going to ask you 12 to do is to give me oral answers today. If you nod 13 your head or shake your head or even if you say 14 "uh-huh" or "uh-uh," that kind of thing, granted we 15 have a videographer here, taking that down, but the 16 real record is the court reporter, and it's going to 17 be hard for her to transcribe if you give me 18 those -- 19 A. Gestures. 20 Q. -- non-oral answers. 21 Yeah. 22 And finally, you know, we can take a break 23 any time you like. 24 A. Okay. 25 Q. And I will try to remember to take one</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Before supervising the gas billing 2 solutions team I supervised NEM billing team -- net 3 energy metering. 4 Q. The net energy -- 5 A. Metering. 6 Q. Metering. 7 And how long were you the supervisor for 8 the net energy metering team? 9 A. Approximately for two years, two to three 10 years. 11 Q. Since you've been at PG&E, have you always 12 worked in some capacity with metering or with 13 billing? 14 A. No, not the entire time. 15 Q. Okay. 16 How long have you worked sort of in that 17 general area? 18 A. I don't work with metering at all, but 19 billing. 20 Q. Okay. 21 A. I worked dealing with billing for the last 22 17 years. 23 Q. So nearly your entire career at PG&E? 24 A. Yes. 25 Q. So you testified you were the supervisor</p>



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1 MS. EDELSTEIN: Again, are you asking in
2 the context of this document?
3 THE WITNESS: In the context of billing, I
4 have seen this, but I can't say what it -- the FT
5 stands for.
6 BY MS. CAPRITTA:
7 Q. How about ADJ, underscore, type DESCR?
8 A. In the context of billing, it's an
9 adjustment type.
10 Q. And so down -- if you look down,
11 there's -- on that first page, it says "ERRA bill
12 credit." Do you know what that means?
13 A. No.
14 Q. And it says ER -- ERES. Do you know what
15 that means?
16 A. Electric residential.
17 Q. So there's some type of residential
18 electricity bill credit?
19 MS. EDELSTEIN: Objection to form.
20 Ms. Robinson testified that she's not
21 familiar with this document.
22 THE WITNESS: I don't know.
23 BY MS. CAPRITTA:
24 Q. And then CUR, underscore, AMT.
25 MS. EDELSTEIN: Is there a question?

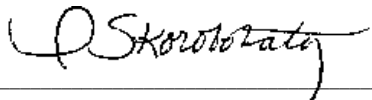
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1 BY MS. CAPRITTA:
2 Q. Do you know what that means?
3 MS. EDELSTEIN: In the context of this
4 document?
5 THE WITNESS: In the context of billing,
6 it means current amount.
7 BY MS. CAPRITTA:
8 Q. And with regard to SA balance, what does
9 that mean?
10 A. The balance that is owed at the SA level.
11 MS. CAPRITTA: Okay. All right. I have
12 no more questions for you, Ms. Robinson. Thank you
13 for your time today.
14 THE WITNESS: Thank you.
15 MS. EDELSTEIN: Before we go off the
16 record, if we can, I'd like to request the
17 opportunity to review Ms. Robinson's -- actually,
18 request on her behalf the opportunity to review the
19 transcript when it's available. And also, given
20 that exhibits have been marked highly confidential,
21 attorneys' eyes only, I'd request that the
22 transcript be designated as such as well.
23 THE VIDEOGRAPHER: This concludes today's
24 proceeding in the deposition of Tanisha
25 Robinson-Brown. The number of videos used is five.

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1 We are now going off the record. The time is 5:20.
2 (Proceedings concluded at 5:20 p.m.)
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1 REPORTER'S CERTIFICATION
2
3 I, INGRID SKOROBHATY, a Certified
4 Shorthand Reporter, hereby certify that the witness
5 in the foregoing deposition was by me duly sworn to
6 tell the truth, the whole truth and nothing but the
7 truth in the within-entitled cause;
8 That said deposition was taken down in
9 shorthand by me, a disinterested person, at the time
10 and place therein stated, and that the testimony of
11 the said witness was thereafter reduced to
12 typewriting, by computer, under my direction and
13 supervision, and that the witness has requested a
14 review pursuant to Rule 30(e)(2).
15 I further certify that I am not of counsel
16 or attorney for either or any of the parties to the
17 said deposition, nor in any way interested in the
18 event of this cause, and that I am not related to
19 any of the parties thereto.
20
21 DATED: August 24, 2017
22
23 
24 INGRID SKOROBHATY, C.S.R. NO. 11669
25



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1 DEPOSITION ERRATA SHEET

2 Assignment No.: J0625018

3 Case Caption: United Energy Trading, LLC v. Pacific
Gas and Electric Company, et al.

4

5

6 DECLARATION UNDER PENALTY OF PERJURY

7 I declare under penalty of perjury that I

8 have read the entire transcript of my deposition

9 taken in the captioned matter or the same has been

10 read to me, and the same is true and accurate, save

11 and except for changes and/or corrections, if any,

12 as indicated by me on the DEPOSITION ERRATA SHEET

13 hereof, with the understanding that I offer these

14 changes as if still under oath.

15 Signed on the ____ day of _____,

16 20____.

17

18 _____

19 TANISHA ROBINSON-BROWN

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1 DEPOSITION ERRATA SHEET

2 Page No.____ Line No.____ Change to:_____

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24 SIGNATURE:_____ DATE:_____

25 TANISHA ROBINSON-BROWN

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1 DEPOSITION ERRATA SHEET

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22 Reason for change:_____

23

24 SIGNATURE:_____ DATE:_____

25 TANISHA ROBINSON-BROWN



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EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIGER NATURAL GAS, INC.,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC
COMPANY, et al.,

Defendants.

Case No. [16-cv-06711-JSW](#)

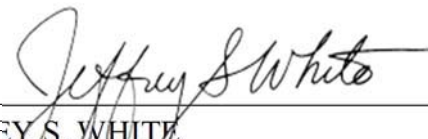
**ORDER STAYING CASE AND
REQUIRING JOINT STATUS
REPORTS**

Re: Dkt. No. 122

On February 4, 2019, Defendant filed a Notice of Bankruptcy. Pursuant to 11 U.S.C. section 362(a), the Court HEREBY STAYS this matter. The parties shall file a joint status report every 180 days advising the Court of the status of the bankruptcy proceedings. The parties' first report shall be due on August 26, 2019. The Court also reserves the right to administratively close this case pending resolution of the bankruptcy proceedings.

IT IS SO ORDERED.

Dated: February 27, 2019



JEFFREY S. WHITE
United States District Judge

United States District Court
Northern District of California